

EXHIBIT 61

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

INA STEINER, DAVID)
STEINER and STEINER)
ASSOCIATES, LLC,)
)
Plaintiffs,)
) CA No. 21-CV-11181-PBS
vs.)
)
EBAY, INC., et al.,)
)
Defendants.)

VIDEOTAPE DEPOSITION OF ANNELI OLAUSSON,
taken pursuant to notice before Beth Gaige,
RPR, a Notary Public in and for the State of
Maine, at the offices of Bernstein Shur, 100
Middle Street, Portland, Maine, on
September 18, 2024, commencing at 8:31 A.M.

<p style="text-align: right;">Page 42</p> <p>1 loyal to him, he would help us get any job we</p> <p>2 wanted, as long as we had his blessing, and</p> <p>3 even offered to pull strings at the CIA and</p> <p>4 State Department where he claimed to have</p> <p>5 connections.</p> <p>6 Is that accurate?</p> <p>7 MR. LYNCH: Just briefly, if I could.</p> <p>8 I have no objection to the witness</p> <p>9 confirming whether Mr. Baugh claimed to be</p> <p>10 able to pull strings at either agency; but if</p> <p>11 you elaborate any further on those, then I</p> <p>12 think I may object, so keep it to just</p> <p>13 answering that question for now.</p> <p>14 Thanks.</p> <p>15 MS. MILLS: Okay.</p> <p>16 A. Yes, he said that.</p> <p>17 BY MS. MILLS:</p> <p>18 Q. Okay. Did Mr. Baugh ever tell you whether he</p> <p>19 had previously worked at the CIA?</p> <p>20 MR. LYNCH: Again no objection to that</p> <p>21 question, but please don't elaborate any</p> <p>22 further.</p> <p>23 A. Yes.</p> <p>24 BY MS. MILLS:</p> <p>25 Q. Okay. And I'm going to ask you, did he give</p>	<p style="text-align: right;">Page 44</p> <p>1 Q. How did you get that sense?</p> <p>2 A. One example is that they would call us, like,</p> <p>3 Jim's Angels, like Charlie's Angles, which is</p> <p>4 just demeaning. So things along those lines.</p> <p>5 Q. Okay. You then go on to say: It was a</p> <p>6 fear-driven and punitive environment where</p> <p>7 minor errors became cause for humiliation and</p> <p>8 punishment.</p> <p>9 Is that accurate?</p> <p>10 A. Yes.</p> <p>11 Q. Do you -- do you believe that you were</p> <p>12 punished while a part of Mr. Baugh's security</p> <p>13 function?</p> <p>14 A. In a sense, yes.</p> <p>15 Q. Okay. You went on to explain: One time an</p> <p>16 analyst accidentally brought an office</p> <p>17 satellite phone home with her, and leadership</p> <p>18 planned an elaborate prank that eBay's CEO was</p> <p>19 in a plane crash and died because of her</p> <p>20 mistake.</p> <p>21 Again leadership in that sentence is Mr.</p> <p>22 Baugh, Mr. Harville, and Ms. Popp?</p> <p>23 A. Yes.</p> <p>24 Q. Tell us about that.</p> <p>25 A. I believe it was Lauren who brought the</p>
<p style="text-align: right;">Page 43</p> <p>1 you any details about that prior employment</p> <p>2 that he claimed to have?</p> <p>3 MR. LYNCH: No objection to answering</p> <p>4 that question yes or no.</p> <p>5 A. No.</p> <p>6 BY MS. MILLS:</p> <p>7 Q. Okay. You then state: Jim Baugh and Dave --</p> <p>8 Jim, that's Jim Baugh, and Dave, Dave</p> <p>9 Harville, told us they were protecting us from</p> <p>10 the sexist world of security while constantly</p> <p>11 making inappropriate sexual comments about our</p> <p>12 appearance, age, et cetera.</p> <p>13 Was that accurate, as well?</p> <p>14 A. Yes.</p> <p>15 Q. Did Mr. Baugh make inappropriate sexual</p> <p>16 comments about either you or any of your</p> <p>17 colleagues?</p> <p>18 A. Not directly to us, but I got the sense that</p> <p>19 it was like a thing that was said.</p> <p>20 Q. Okay. And you mention Jim and Dave.</p> <p>21 Is that something -- did you experience</p> <p>22 that from Mr. Harville?</p> <p>23 A. Yes, in the same manner that I just said. Not</p> <p>24 directly, but I got the sense that it was</p> <p>25 something that was talked about.</p>	<p style="text-align: right;">Page 45</p> <p>1 satellite phone home. And I mean, they did it</p> <p>2 under the guise of joking around, but it was</p> <p>3 obviously making an example of her. And I</p> <p>4 don't remember exactly how it happened. I</p> <p>5 think they might have called her and were just</p> <p>6 messing with her.</p> <p>7 Q. Okay. Did you have a sense that that upset</p> <p>8 Lauren?</p> <p>9 A. Yes.</p> <p>10 Q. Did you have a sense that Lauren believed</p> <p>11 them, that eBay's CEO had been in a plane</p> <p>12 crash and died because of her mistake?</p> <p>13 A. I don't know if she really believed them or</p> <p>14 not; but even if she didn't, it was very</p> <p>15 stressful to be called by your bosses and have</p> <p>16 this prank, quote, unquote --</p> <p>17 Q. Mm-hmm.</p> <p>18 A. -- done to you.</p> <p>19 Q. Okay. And -- and to your knowledge, they were</p> <p>20 telling her that that, in fact, had happened;</p> <p>21 that because of her mistake eBay's CEO had</p> <p>22 been in a plane crash and died?</p> <p>23 A. I -- yes, that's what they had said to her. I</p> <p>24 don't know if -- yeah.</p> <p>25 Q. Okay. Okay. You then go on to say: They</p>

<p style="text-align: right;">Page 46</p> <p>1 routinely subjected us to drills that they</p> <p>2 claimed were to test our protected -- our</p> <p>3 preparedness.</p> <p>4 Again they is Mr. Baugh, Mr. Harville,</p> <p>5 and Ms. Popp?</p> <p>6 A. Correct.</p> <p>7 Q. And you stated: In reality, it was to convey</p> <p>8 their power over us, humiliate and scare us.</p> <p>9 Was that your sense, as well?</p> <p>10 A. Yes.</p> <p>11 Q. That Mr. Baugh was looking to convey his power</p> <p>12 over that group of young female analysts?</p> <p>13 A. That's how it felt to me.</p> <p>14 Q. Okay. You stated: Some included active</p> <p>15 shooter drills where leadership would pretend</p> <p>16 to shoot us in the middle of eBay's campus for</p> <p>17 all staff to watch or earthquake drills where</p> <p>18 they would blast air horns in our ears while</p> <p>19 timing our response to write an e-mail with no</p> <p>20 grammatical errors.</p> <p>21 Do you remember those -- is that</p> <p>22 accurate?</p> <p>23 A. Yes.</p> <p>24 Q. Do you remember those active shooter drills?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 48</p> <p>1 Q. Belittled?</p> <p>2 A. Yes.</p> <p>3 Q. You went on to state: The trash bags sat in</p> <p>4 the corner of our office for the day while</p> <p>5 leadership mocked what we had in our lockers</p> <p>6 before we were allowed to have our things</p> <p>7 back.</p> <p>8 Did Mr. Baugh, Mr. Harville, and Ms. Popp</p> <p>9 mock what you had in your lockers?</p> <p>10 A. Not me personally.</p> <p>11 Q. Okay. Did they mock what others had in their</p> <p>12 lockers in front of you?</p> <p>13 A. Yes.</p> <p>14 Q. What were some examples of things that they</p> <p>15 mocked, if you remember?</p> <p>16 A. It was stupid, like, snacks that they had or</p> <p>17 things that honestly don't even make sense.</p> <p>18 Like snacks or a sweater or deodorant or</p> <p>19 things like that.</p> <p>20 Q. Okay. Personal things?</p> <p>21 A. Yes.</p> <p>22 Q. You then stated: Leadership went out of our</p> <p>23 way to make us feel awful, and for the</p> <p>24 majority of my tenure there I feared the sight</p> <p>25 of them.</p>
<p style="text-align: right;">Page 47</p> <p>1 Q. And leadership, that's again Mr. Baugh, Mr.</p> <p>2 Harville, and Ms. Popp, would pretend to shoot</p> <p>3 you for -- was it for the -- the intelligence</p> <p>4 analysts to watch?</p> <p>5 A. That was one of the parts of the drill; that</p> <p>6 there's a victim.</p> <p>7 Q. Okay. Was one of the analysts used as that,</p> <p>8 quote, unquote, dead shooting victim?</p> <p>9 A. Yes.</p> <p>10 Q. Do you remember who that was?</p> <p>11 A. No.</p> <p>12 Q. Okay. You then wrote: Another time an</p> <p>13 analyst forgot to lock their locker, so</p> <p>14 leadership instructed a security guard to</p> <p>15 empty our locker belongings into clear trash</p> <p>16 bags while we all stood in a line and watched.</p> <p>17 Did you -- do you remember that?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. Leadership again Mr. Baugh, Mr.</p> <p>20 Harville, and Ms. Popp?</p> <p>21 A. Yes.</p> <p>22 Q. And how did that -- how did that feel?</p> <p>23 A. Bad, demoralizing.</p> <p>24 Q. Did you feel humiliated?</p> <p>25 A. Yeah.</p>	<p style="text-align: right;">Page 49</p> <p>1 Did you come eventually to fear the sight</p> <p>2 of Mr. Baugh, Mr. Harville, and Ms. Popp?</p> <p>3 A. I -- yes. I mean, I wasn't afraid for my life</p> <p>4 or anything like that, but I -- it was</p> <p>5 definitely a very toxic environment.</p> <p>6 Q. Okay. Was it a sense of dread that you felt</p> <p>7 when you would see Mr. Baugh by the end of</p> <p>8 your employment?</p> <p>9 A. Yes.</p> <p>10 Q. You then stated: Because we were contractors</p> <p>11 via Concentric, we did not have access to</p> <p>12 eBay's own HR, and leadership effectively</p> <p>13 blocked our communications to Concentric.</p> <p>14 Is that accurate?</p> <p>15 A. Yes.</p> <p>16 Q. How did Mr. -- how did you understand that Mr.</p> <p>17 Baugh and Mr. Harville and Ms. Popp</p> <p>18 effectively blocked your communications to</p> <p>19 Concentric?</p> <p>20 A. I wouldn't say they technologically blocked</p> <p>21 our ability to communicate with them. They</p> <p>22 more insinuated, like, we can solve all our</p> <p>23 problems here and you don't need to go outside</p> <p>24 of our tight-knit team to solve things like</p> <p>25 that.</p>